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U.S. Department of Justice

United States Attorney
Southern District of New York

MEMO ENDORSED

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

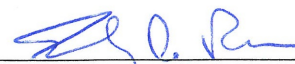
February 17, 2020

BY ECF

The Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: **United States v. Neil Cole, 19 Cr. 869 (ER)**

The application is X granted
_____ denied



Edgardo Ramos, U.S.D.J.
Dated: 2/18/2020
New York, New York

Dear Judge Ramos:

The Government and counsel for defendant Neil Cole jointly and respectfully write to propose an agreed-upon schedule governing pre-trial matters in the above-captioned case. The parties respectfully request that the Court adopt the proposed schedule.

On or before March 2, 2020:	Pretrial motions due
Eight weeks before trial:	Government expert disclosures due
Seven weeks before trial:	Government 404(b) notice due
Five weeks before trial:	Defense expert disclosures due Defense produces any Rule 16 (earlier if voluminous) Defense and Government both sign acceptable custodian stipulations
Four weeks before trial:	With Government's receipt of reasonable authenticity and/or business records stipulations, Government produces witness list, 3500, <i>Giglio</i> , and exhibits (identified as of that date) Defense provides notice of any advice of counsel defense
Two weeks before trial:	Defense produces witness list and Rule 26.2 materials
Ten days before trial:	Defense exhibits (identified as of that date), including both (a) any non-impeachment exhibits to be offered through Government witnesses or otherwise during the Government's case; and (b) any exhibits to be offered in the defense case

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Respectfully submitted,

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Southern District of New York

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Southern District of New York
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cc: Counsel of Record (via ECF)